

1 Joel E. Tasca
Nevada Bar No. 14124
2 David E. Chavez
Nevada Bar No. 15192
3 BALLARD SPAHR LLP
1980 Festival Plaza Drive, Suite 900
4 Las Vegas, Nevada 89135
Telephone: 702.471.7000
5 Facsimile: 702.471.7070
tasca@ballardspahr.com
6 chavezd@ballardspahr.com

7 *Attorneys for Defendant*
8 *JPMorgan Chase Bank, N.A.*

9
10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 Jennafer Aycock,
13 Plaintiff,

14 v.

15 JPMorgan Chase Bank, N.A.; Experian
16 Information Solutions, Inc.; Trans Union,
LLC; Equifax Information Services, Inc.,
17 Defendants.

CASE NO. 2:23-cv-00294-MMD-EJY

**Joint Motion and ~~Proposed~~ Order to
Extend JPMorgan Chase Bank, N.A.'s
Deadline to Reply to ECF No. 72**

(Second Request)

17 Currently pending before the court is a motion to compel by defendant
18 JPMorgan Chase Bank, N.A. ("JPMC"). ECF No. 61. The motion was filed on
19 December 17, 2023. *Id.* The original deadline for plaintiff Jennafer Aycock's
20 ("Plaintiff") response was January 1, 2024, but this deadline—and the associated
21 deadline for JPMC's reply—was extended pursuant to a stipulation by the Parties
22 and granted by this Court. ECF No. 63. Now, the operative deadline for JPMC's
23 reply is January 22, 2024. *Id.*

24 JPMC has requested, and Plaintiff has agreed, that the January 22 deadline
25 be extended up to and including January 26, 2024. JPMC asserts that there is good
26 cause to grant this extension due to the delays caused by the Martin Luther King, Jr.
27 holiday on January 15, and unanticipated familial obligations that required JPMC's
28 counsel to take time off from work on January 12. This is the second request for an

BALLARD SPAHR LLP
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135
702.471.7000 FAX 702.471.7070

extension of the reply deadline.

This request is made in good faith and not for purposes of delay.

Dated: January 18, 2024

BALLARD SPAHR LLP

KAZEROUNI LAW GROUP, APC

By: /s/ David E. Chavez

By: /s/ Gustavo Ponce

Joel E. Tasca
Nevada Bar No. 14124
David E. Chavez
Nevada Bar No. 15192
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135

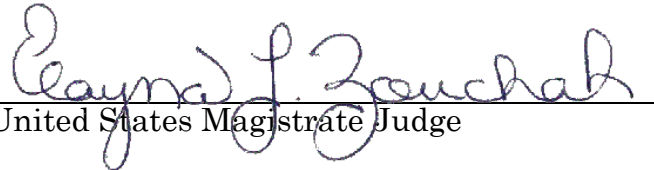
Gustavo Ponce
Nevada Bar No. 15084
Mona Amini, Esq.
Nevada Bar No. 15381
6069 South Fort Apache Road, Suite 100

Attorneys for Plaintiff

*Attorneys for Defendant
JPMorgan Chase Bank, N.A.*

ORDER

IT IS SO ORDERED:


United States Magistrate Judge

DATED: January 19, 2024

BALLARD SPAHR LLP
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135
702.471.7000 FAX 702.471.7070